

December 20, 2022

VIA ECF

Hon. Denise Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. James Velissaris*, No. 22 Cr. 105 (DLC)

Dear Judge Cote:

We write to correct several statements in the letter Ms. Stacey Lindell sent to the Court, which was filed on the docket on December 6, 2022. (Dkt. 74).

Mr. Velissaris is one of several producers of “Black Spartans,” a movie about the first fully integrated college football team, the Michigan State Spartans, which won the national championship in the mid-1960s. The movie is based on a book written by Mr. Velissaris’ stepfather, and filming was completed on October 14, 2022.

Without describing her relationship to the film, Ms. Lindell asserts that “the majority” of those who worked on the movie have not been paid. But the production’s payroll company – not Mr. Velissaris – has been responsible for making all payments to the actors and crew, and we understand that the vast majority of such payments have been made.

Moreover, Ms. Lindell speculates that Mr. Velissaris “is in possession of all these workers I-9 and social security information,” and that he “may use this information to hide assets in off-shore banks, create new identities for himself, or potentially flee justice.” This allegation is also baseless. In fact, the payroll company gathered and maintains control over that information, and Mr. Velissaris does not have access to it.

Because Ms. Lindell’s claims are inaccurate, we urge the Court to disregard them entirely when considering the appropriate sentence for Mr. Velissaris.

Respectfully yours,

Paul J. Fishman